

EX PARTE OR LATE FILED



The Telecommunications Association

DOCKET FILE TOP ORIGINAL

TEL +1-202-872-0030
FAX +1-202-872-1331
Direct Dial

RECEIVED

JUN - 7 1995

June 7, 1995

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

EX PARTE

Re: PR. Docket No. 92-235

Dear Mr. Caton:

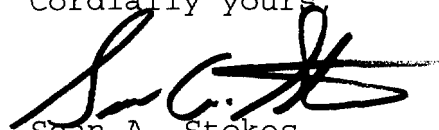
This is to notify you, pursuant to Section 1.1206(a) of the Commission's Rules, that Sean A. Stokes, representing UTC, The Telecommunications Association made a presentation to the staff of Commissioner Ness today on the "refarming" of the Private Land Mobile bands below 512 MHz as proposed in the above-referenced docket.

UTC stressed the importance of private land mobile radio systems to electric, gas and water utilities and natural gas pipelines. UTC noted its support for the consensus plan developed by UTC and other organizations which collectively represent the vast majority of licensees in the affected bands. UTC objected to the adoption of any plan that does not allow sufficient time for the development of a competitive marketplace in quality radio equipment with features needed by utilities and pipelines for their critical land mobile communications.

A copy of the handout used during UTC's presentation is attached for filing in this docket. Two copies of this notice are submitted pursuant to Section 1.1206(a).

Should any questions arise concerning this notification, please communicate with the undersigned.

Cordially yours,


Sean A. Stokes
Senior Staff Attorney

cc: David Siddall
Public Inspection File

No. of Copies rec'd 042
List ABCDE



The Telecommunications Association

TEL +1•202•872•0030
FAX +1•202•872•1331
Direct Dial

RECEIVED

JUN - 7 1995

**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY**

**SUMMARY OF UTC POSITION ON
PRIVATE LAND MOBILE "REFARMING"
PR Docket No. 92-235**

1. Introduction
2. Why Utilities/Pipelines Operate Private Systems
3. Summary of UTC's Position:
 - A. Transition Timing -- UTC supports industry consensus plan for graceful migration to new technologies.
 - B. Consolidation of Radio Services -- Some consolidation might be appropriate.
 - C. Public Service Mutual Aid Channels -- Channel pairs in the VHF and UHF bands should be designated for public service mutual aid use.
 - D. Power/Height Limits -- Use a "safe harbor" table of recommended power/height combinations.
 - E. Trunking -- Rules should encourage, but not mandate, trunking.
 - F. "Innovative Shared Use" channels -- channels created through refarming should be retained for primarily private land mobile operations.

PROPOSED PART 88 TRANSITION PLAN

	January 1, 1997	January 1, 2005	January 1, 2015
MANUFACTURERS	All new equipment which is manufactured, imported or sold must be maximum 12.5 kHz* or 12.5 kHz compatible (e.g., dual-mode 25/12.5 kHz; but not single-mode 25 kHz equipment)	All <u>newly</u> type accepted equipment must be maximum 6.25 kHz* or 6.25 kHz compatible. (e.g., dual-mode 12.5/6.25 kHz, but not single-mode 25 kHz or 12.5 kHz equipment)	All new equipment which is manufactured, imported or sold must be maximum 6.25 kHz* or maximum 12.5 kHz if convertible to 6.25 kHz.
URBAN** SYSTEMS Existing Systems		All urban systems must operate at no more than 12.5 kHz* bandwidth to retain primary status.	Must operate at no more than 6.25 kHz* bandwidth to retain primary status.
New Systems***	Must operate at no more than 12.5 kHz* bandwidth to attain primary status.	Must operate at no more than 6.25 kHz* bandwidth to attain primary status.	
RURAL** SYSTEMS Existing Systems			Must operate at no more than 6.25 kHz* bandwidth to retain primary status
New Systems***	Must operate at no more than 12.5 kHz* bandwidth to attain primary status.	Must operate at no more than 6.25 kHz* bandwidth to attain primary status.	
SECONDARY OFFSET USERS AT 450-470 MHZ (All Markets)	May attain co-primary status with other new systems if operations are limited to no greater than 12.5 kHz bandwidth.		Must operate at no more than 6.25 kHz* to attain primary status as against all users

* Bandwidth limitations may be exceeded if the system will operate with efficiency equivalent to or better than the stated bandwidth. For purposes of type acceptance, the radio must be capable of net data throughput of at least of 4.8 kbps.

** "Urban Systems" are those located within 100 miles of any of the top 60 urban areas listed at Section 90.741. All other areas would be considered "Rural." Upon request by a petitioning party, other areas of the country may be declared "Urban" upon a showing of increased frequency congestion necessitating early introduction of spectrum efficient technologies.

*** A "new system" is one which is not functionally integrated with an earlier-installed land mobile radio system. To be considered an "existing system," the facilities must be in operation prior to the relevant deadline or must be functionally integrated with such a system. For example, a new repeater site which will be used to extend coverage of an existing system and will relay traffic of mobiles currently operating with an existing system would not be considered a "new system." (See definition of "Land Mobile Radio System" at Section 90.7).